

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AIP ACQUISITION LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-616 (GMS)
)	
IBASIS, INC.,)	
)	
Defendant.)	

**STIPULATED MOTION AND [PROPOSED]
ORDER OF DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiff AIP Acquisition LLC and Defendant iBasis, Inc., hereby move for an order dismissing all claims and counterclaims in this action WITH PREJUDICE, with each party to bear its own costs, expenses and attorneys' fees.

MORRIS JAMES LLP

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Richard K. Herrmann

/s/ Regina S.E. Murphy

Richard K. Herrmann (#405)
Kenneth L. Dorsney (#3726)
Mary B. Matterer (#2696)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
(302) 888-6800
rherrmann@morrisjames.com
kdorsney@morrisjames.com
mmatterer@morrisjames.com

Jack B. Blumenfeld (#1014)
Regina S.E. Murphy (#5648)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@mnat.com
rmurphy@mnat.com

Attorneys for Plaintiff AIP Acquisition LLC

Attorneys for Defendant iBasis, Inc.

OF COUNSEL:

Karen H. Bromberg
Francisco A. Villegas
Damir Cefo
Maria Granovsky
COHEN & GRESSER LLP
800 Third Avenue
New York, New York 10022
(212) 957-7600

OF COUNSEL:

Matthew J. Moore
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, DC 20004-1304
(202) 637-2200

Clement Naples
Cassius K. Sims
LATHAM & WATKINS LLP
885 Third Avenue
New York, NY 10022-4834
(212) 906-1200

Neil Rubin
LATHAM & WATKINS LLP
355 South Grand Avenue
Los Angeles, CA 90071-1560
(213) 485-1234

May 28, 2013

SO ORDERED this _____ day of _____, 2013.

CHIEF, UNITED STATES DISTRICT JUDGE